

# **Malmstrom Air Force Base Affirmative Procurement Plan**

(OPLAN 00-1)

(UNCLASSIFIED)



October 2000

PREPARED BY:  
341 CES, ENVIRONMENTAL FLIGHT  
MALMSTROM AIR FORCE BASE, MONTANA



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 341ST SPACE WING (AFSPC)**

20 October 2000

MEMORANDUM FOR DISTRIBUTION (APPENDIX Z)

FROM: 341 SW/CC

SUBJECT: Malmstrom AFB Affirmative Procurement (AP) Plan 00-1, Letter of Transmittal

1. Attached is the MAFB AP OPLAN 00-1. This is the Malmstrom AFB supporting plan for Environmentally Preferable Purchasing. Requests for change in distribution should be sent to 341 SW/XP.
2. This plan is effective for planning and implementation upon receipt. All purchasing agents on base will implement this plan. This is the initial distribution of the plan and supersedes no others.
3. Elements were coordinated with applicable 341 SW agencies as well as tenant units.
4. The Environmental flight (341 CES/CEV) is the office of primary responsibility for this plan. An annual review of the plan will be conducted by the Environmental Flight. All recommendations for revisions are to be forwarded to 341 CES/CEV.

//Signed//

THOMAS F. DEPPE, Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 341ST SPACE WING (AFSPC)**

Date:

MEMORANDUM FOR 341 SW/XP

FROM:

SUBJECT: Distribution of Malmstrom AFB Affirmative Procurement Plan 00-1

1. Change distribution for subject document as follows:

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- ☐ The listed changes apply to this plan only.
- ☐ The listed changes apply to all Plans/OPLANs distributed by 341 SW/XP

2. Remarks:

\_\_\_\_\_  
(Signature of Commander or Authorized Representative)

**MAFB OPLAN 00-1**  
**SECURITY INSTRUCTIONS (U)**

**SECURITY INSTRUCTIONS:**

1. The Long title of this plan is Malmstrom Air Force Base Affirmative Procurement Plan 00-1. The short title is MAFB AP Plan.
2. This document is unclassified.
3. As this plan is unclassified, it does not come within the scope of directives governing the protection of information affecting national security as specified in Air Force Directives, 205 series.
4. This plan will be distributed to those organizations shown on the Distribution List, Appendix Z. The plan will be controlled in accordance with established USAF procedures for unclassified documents.
5. Tasked organizations are authorized to extract and reproduce those portions of this document essential in the accomplishment of necessary planning and in the preparation of supporting documents and reports.

**REVIEW AND AMENDMENT INSTRUCTIONS:**

The review of the AP Plan, and any resulting amendments or changes to the plan must be logged on the record tables immediately following these instructions. The AP Plan will be reviewed at least annually when Wing Plans initiates the review process.

RECORD OF CHANGES:

CHANGE NUMBER	COPY NUMBER	DATE ENTERED	POSTED BY

RECORD OF ANNUAL REVIEW:

REVIEWED BY	DATE OF REVIEW	REMARKS

**MAFB OPLAN 00-1**  
**PLAN SUMMARY (U)**

1. **PURPOSE:** The purpose of this plan is to provide guidance to Malmstrom AFB personnel on Environmentally Preferable Purchasing. The plan explains the legal and policy drivers, the four required sections, and finally provides a list of resources to aid in implementation. Overall the goal of the plan is to use the purchasing power of the United States government to increase the market for products with recycled content and help prevent pollution.
2. **CONDITIONS FOR IMPLEMENTATION:** This plan will be implemented for all purchases.
3. **OPERATIONS TO BE CONDUCTED:** This plan will effect all MAFB purchases by giving preference to products with certain levels of recycled content.
4. **KEY ASSUMPTIONS:** It is assumed that all personnel will make a conscience effort to involve AP as early as possible in the procurement process.
5. **OPERATIONAL CONSTRAINTS:** The plan will be used when items meet technical, price, time, and availability requirements explained in detail in section ~~2.1.1~~2.1.2.
6. **TIME TO COMMENCE EFFECTIVE OPERATIONS:** This plan will be implemented immediately upon receipt.
7. **COMMAND RELATIONSHIPS:** Normal command relationships are in effect.
8. **LOGISTICS APPRAISAL:** This plan is logistically feasible at this time.
9. **PERSONNEL APPRAISAL:** This plan is feasible based upon current personnel levels.
10. **CONSOLIDATED LISTING AND IMPACT ASSESSMENT OF SHORTFALL AND LIMITING FACTORS:** N/A
11. **DEFINITIONS OF TERMS:** See Appendix A

**MAFB OPLAN 00-1**  
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*This Plan is best viewed on the computer and not as a printed document. There are hyperlinks in the document to allow you to easily reference required Internet sites and to jump to parts of the Plan that are important for referencing.*



**MAFB OPLAN 00-1**  
**BASIC PLAN (U)**

**CHAPTER ONE: INTRODUCTION**

*Today I am pleased to sign an Executive Order strengthening federal efforts to protect the environment and promote economic growth through the purchase of recycled and other environmentally preferable products. ... By redoubling our efforts to "green the government," we are demonstrating once again that the environment and the economy go hand in hand, and helping to promote a more sustainable future for America.*

President Bill Clinton

September 14, 1998

**1.0 Background**

As President Bill Clinton, signed Executive Order (EO) 13101, he noted that the federal government has a special responsibility to lead the way in building markets for recycled goods. **Affirmative procurement** (AP) is the name given to this buy-recycled purchasing program. The intent of the program is to stimulate recycling by providing a market for new products manufactured with recycled materials. The federal government, as the country's largest purchaser of goods and services, has the ability to help create and stabilize markets for recycled-content products.

Before EO 13101 was signed on 14 September 1998, EO 12873 was the order that mandated the AP program. It emphasized buying recycled-content products. These products were originally singled out for AP because they helped reduce solid waste disposal, minimize natural resource use, and often use less energy to produce than comparable "virgin" material products. These are good environmental performance characteristics, but there are other considerations that recycled-content products generally don't address: reducing toxicity, preventing air or water pollution, or reducing negative effects like global warming or ozone depletion.

EO 13101 has now superseded EO 12873. It was written to *improve* the federal government's use of recycled-content products, and *expand* the AP program (APP) to include other environmentally preferable products and services. Under EO 13101, the APP that was developed in response to EO 12873 will continue. The program name will not change, but its scope will be broadened to include new types of environmentally preferable purchases.

The President's statement about EO 13101 points out this new emphasis. Environmentally preferable purchasing, or EPP, is the name of the U.S. Environmental Protection Agency's (EPA) program to encourage the purchase of products which have lesser or decreased effects on

human health and the environment, when compared with competing products or services that serve the same purpose.

EO 13101 also encourages federal agencies to consider “biobased products”. A **biobased product** is “a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials.” Examples of biobased products include vegetable-based lubricating oils, building construction panels made with straw or other agricultural fibers, and “tree-free” paper. These products often put materials to use that were destined for the landfill. Since they are usually made of “natural” materials with limited processing, they may also be less toxic and require fewer chemicals and less energy to produce.

## 1.1 Benefits of Environmentally Preferable Purchasing

It is clear that EPP benefits the environment and demonstrates our commitment to environmental stewardship. However, the operational benefits may not be as obvious. AP provides tangible benefits in many cases. Here are some examples of the advantages gained by using environmentally preferable products:

Plastic lumber can replace wood in certain applications. This removes the need to paint the materials. Money and labor are saved during installation and routine maintenance. Plastic lumber will not rot, so it lasts longer than wood, even though it is not pressure treated with toxic chemicals like wood often is. By buying re-refined motor oil, and then sending the used oil back to the producer for re-refining, the expense and waste management problems that come with disposing of used oil are eliminated. This cycle of using, processing and re-using a material is known as **closed-loop recycling**. Toner cartridges, antifreeze, and tires are other products that may be handled through closed loop recycling.

In some cases, the best environmentally preferable purchase may not be a purchase at all – it may be a purchase *avoided* by re-using materials already on site. For example, when clearing a construction site, consider setting aside trees and woody shrubs and chipping them for use as mulch or for composting. Segregate concrete and asphalt that is demolished, crush it, then reuse the concrete as aggregate or road base and reprocess the asphalt for use in paving. These actions save the cost of hauling and disposing waste, and the purchase price of new materials.

As Air Force organizations purchase and use a broader range of environmentally preferable products, more benefits will be discovered. Durability, reduced toxicity, and the elimination of waste streams are likely to be among the common advantages.

## 1.2 Drivers for the Affirmative Procurement Program

Laws, regulations, and Executive Orders combine to provide the authority and requirements for federal AP programs. A brief summary of these drivers and how they interact is presented below. Detailed program requirements that stem from them are contained in Chapter 2. The references in Chapter 3 include a list of World Wide Web links for policy information.

### **1.2.1 Resource Conservation Recovery Act (RCRA)**

The legal authority for the APP comes from the Resource Conservation Recovery Act (RCRA) Section 6002. It requires federal agencies to give preference in their purchasing programs to products and practices that conserve and protect natural resources and the environment. RCRA is also the source for the four required elements of an APP: a preference program, a promotion program, a certification program, and a monitoring program. The four elements are discussed in detail in [Section 2.2](#) of this plan.

**1.2.2 Executive Order (EO) 13101**, “Greening the Government through Waste Prevention, Recycling, and Federal Acquisition,” 14 Sep 98  
<http://www.pub.whitehouse.gov/search/executive-orders.html>

Executive Orders are presidential directives to the federal agencies. EO 13101 describes APP requirements for federal agencies, as well as for the groups that oversee them: the Federal Environmental Executive (FEE), the Council on Environmental Quality (CEQ), EPA, and the U.S. Department of Agriculture (USDA). CEQ and the FEE provide overall policy direction and implementation oversight. The FEE is required by EO 13101 to establish committees and work groups as needed to develop answers for unresolved issues such as AP tracking and reporting. The Office of the FEE (OFEE) has also developed a government-wide Strategic Plan for EO 13101. This Plan states: “Requirements of EO 13101 do not apply to facilities and posts abroad except for purchases made in the United States for shipment overseas.”

EO 13101 carries forward the recycled-content product procurement program from EO 12873, and expands it by adding the biobased products procurement program. EPA administers the recycled-content program and USDA will administer the biobased product program.

**1.2.3 Comprehensive Procurement Guidelines (CPG)** – Federal Register “Final Rules”  
<http://www.epa.gov/cpg>

The CPG is the document the EPA uses to formally designate the items covered by the APP. As a result the designated items are known as “guideline items.” The process begins as the EPA reviews a broad list of potential products made from recovered materials. They consider the availability of the item, the potential impact on the solid waste stream, the economic and technical feasibility of producing the item, and other uses of the recovered materials used to produce the item. The EPA also considers comments from end users, manufacturers, distributors, the general public, and other interested parties through a formal rulemaking process to designate items. The list of guideline items is complete when EPA publishes it as a Final Rule in the Federal Register. This process was completed for the first time with the publication of CPG I in the May 1, 1995 Federal Register. **The CPG list is a living document.** Expect the CPG list to continue to grow, since EPA is tasked by EO 13101 to update the CPG every two years or as appropriate.

**The EPA has created an excellent Web page for CPG information: The “Products” section of the page lists all currently designated and proposed guideline items and their associated recycled-content requirements. The full text of each CPG is found in the “Background” section. Other sections of the Web page provide product fact sheets, give CPG program updates, and answer frequently asked questions.**

**1.2.4 Title 40, Code of Federal Regulations (CFR), Part 247 (40 CFR 247) – “Comprehensive Procurement Guideline for Products Containing Recovered Materials”**  
[http://www.access.gpo.gov/nara/cfr/waisidx\\_99/40cfr247\\_99.html](http://www.access.gpo.gov/nara/cfr/waisidx_99/40cfr247_99.html)

These are the regulations that codify the CPG requirements. 40 CFR 247 lists the product categories defined in the CPG, defines terms, and describes to whom the program applies. The CFR also calls on federal agencies to assure their specifications for purchase of guideline items require the use of recovered materials to the maximum extent possible.

**1.2.5 Air Force Instruction (AFI) 32-7080: “Compliance Assurance and Pollution Prevention”**  
<http://afpubs.hq.af.mil/pubs/publist.asp?puborg=AF&series=32>

AFI 32-7080 contains Air Force policies, requirements, and responsibilities for pollution prevention programs, including AP. Although it is a Civil Engineer series AFI, its requirements apply beyond CE and the Environmental Flight to personnel in Contracting, Logistics, Operations, Legal, Safety, Bioenvironmental Engineering, and Public Affairs. All personnel supporting the APP should become familiar with the sections of AFI 32-7080 covering the program goals and execution.

**1.2.6 AF Engineering Technical Letter (ETL) 00-1: “EPA Guideline Items in Construction and Other Civil Engineering Specifications”.**

ETL 00-1 (formerly ETL 94-7, 99-8) makes it mandatory for civil engineer specifications to include EPA designated guideline items containing recycled material unless the recycled-content product does not meet specific performance, price, or contracting requirements. See [Section 2.1.12.1.2](#) of this Plan for a discussion of the exemption criteria and how to apply them.

**1.2.7 Federal Acquisition Regulation (FAR) and DoD FAR Supplement (DFARS)**  
<http://www.arnet.gov/far>

FAR Subchapter D, Part 23 “Environment, Conservation, Occupational Safety, and Drug-Free Workplace” includes requirements for AP. The applicable sections include Subpart 23.4--Use of Recovered Materials, and Subpart 23.7--Contracting for Environmentally Preferable and Energy-Efficient Products and Services. FAR Subchapter D, Part 52 contains requirements for contract clauses. The FAR requires agencies to acquire recycled-content and other environmentally preferable products where cost effective, and to prepare written determinations for official signature whenever they acquire EPA designated items that **do not meet** the EPA minimum recovered material standards.

These requirements are supplemented by DFARS 223.404(b)(3). It forbids awarding a contract for an EPA designated item that does not meet the EPA minimum recovered material standards, before approval of the written determination required by the FAR.

### **1.2.8 Summary**

EO 13101 calls for federal agencies to “comply with executive branch policies for the acquisition and use of environmentally preferable products and services and implement cost-effective procurement preference programs favoring the purchase of these products and services.” This call to action is based on the requirements of the many drivers listed above. The rest of this Plan will discuss the specific program requirements in greater detail, describe the Malmstrom Air Force Base approach to AP, and list tools and resources.

## **CHAPTER 2: THE MALMSTROM AIR FORCE BASE AFFIRMATIVE PROCUREMENT PROGRAM**

### **2.0 Applicability**

Once a guideline item is designated by EPA, procuring agencies are required by RCRA and 40 CFR 247 to purchase a product composed of the highest percentage of recovered materials practicable, taking into consideration competition, price, availability, and performance. RCRA defines “procuring agencies” as federal, state, and local agencies, and their contractors, that use appropriated federal funds. According to CPG I, the requirement applies when the purchase price of the item exceeds \$10,000 or when the total cost of such items, or of functionally equivalent items, purchased by the agency during the preceding fiscal year was \$10,000 or more.

In applying the \$10,000 annual threshold, Section 202 of EO 13101 defines the term “agency” to be the Department of Defense, not an individual military department. Therefore, because DoD spends more than \$10,000 annually on each of the guideline items:

**All AF CONUS installations must establish AP programs to ensure purchases of all designated guideline items comply with EPA recycled-content requirements. (Note: CONUS is defined as the continental US, Alaska, Hawaii, and territories/possessions.)**

This requirement is echoed in AFI 32-7080. Purchases of all designated guideline items must meet or exceed EPA’s recommended recycled-content requirements, unless an exemption applies (see Section ~~2.1.1~~2.1.2 of this Plan for an explanation of exemptions).

40 CFR 247 also points out that RCRA AP requirements apply to federal agencies whether or not they are using appropriated funds for procurement of designated items. Therefore:

**Non-appropriated fund activities must participate in the installation APP to ensure that when they purchase guideline items for their own use, their purchases meet EPA recycled-content requirements.**

Section 701 of EO 13101 directs agencies to include AP requirements in all contracts for operation of Government-owned or leased facilities, and also in contracts that provide for support services at Government-owned or operated facilities. This is clearly stated in the EO:

**Contracts awarded by executive agencies after 14 Sept 98 shall include provisions that obligate the contractor to comply with EO 13101 within the scope of their operations.**

Mandatory purchase requirements apply to recycled-content (CPG) item purchases, but not to biobased products. There are presently no hard requirements for purchase of biobased products. If legal requirements are promulgated in the future or in the event DoD issues policy on the purchase of biobased products, these requirements will become part of the APP. Please see [Section 2.2.1.3](#) for more discussion.

## 2.1 Requirements for Purchasers of Guideline Items

This section provides a summary of requirements for purchasers of guideline items, explains the use of AP purchasing exemptions, and discusses the use of written determinations.

### 2.1.1 Summary of Requirements for Purchasers

The requirements for purchasers of guideline items can be summarized as follows:

Each CONUS installation must have an AP program, and all purchases of guideline items must comply with EPA recycled-content requirements unless an exemption applies. Purchases made in the United States for shipment overseas also must comply with EPA requirements.

If an USAF contract includes the purchase of guideline items, the contract specifications must require the product to meet the EPA recovered material content requirements, unless written determination is provided for the contract file before the contract is awarded.

When making an USAF credit card purchase of guideline items, the purchaser must select products meeting EPA recovered material content requirements unless an exemption applies. If the requirements were not met, a written determination must be placed in the purchase files.

It is important to understand that these are unique circumstances for individual purchases. They do not provide an excuse for avoiding APP requirements in general. Section 402(c) of EO 13101 states: "For the EPA designated guideline items . . . agencies shall ensure that their affirmative procurement programs require 100 percent of their purchases of products to meet or exceed the EPA guideline".

### 2.1.1 Exemptions and Written Determinations

The APP is intended to promote cost-effective environmentally preferable purchasing. The authors of RCRA recognized that there would be occasions when the use of a recycled-content product would not meet operational needs, and they provided exemptions to cover these situations. These exemptions are reflected in EO 13101, 40 CFR 247, and AFI 32-7080. Recycled-content products meeting EPA guidelines will always be purchased unless they:

- Are not available within a reasonable period of time; or
- Fail to meet the performance standards set forth in applicable specifications or fail to meet reasonable performance standards of the procuring agency; or
- Are not available from a sufficient number of sources to maintain a satisfactory level of competition (i.e., available from two or more sources); or
- Are only available at an unreasonable price. If the cost of the recycled-content product exceeds comparable product costs, the cost is considered unreasonable.

An exemption may be claimed if one or more of these criteria are met. **To invoke the exemption, a written determination is required.** FAR 23.404(b)(3) places the responsibility to prepare this determination on “technical or requirements personnel” and states it must be signed “by an official designated by the agency head.” The Air Force has given signature authority for these determinations to the commander of the requiring activity. At Malmstrom the squadron commander will sign the “Recovered Materials Determination Form” (see ~~the~~ Appendix C) which will be used to document the determination. The form will be used in this way:

Determination forms will be used for all procurement actions that include one or more guideline items. Determination forms certify that the purchase meets EPA requirements (in which case it is signed by the requester), or to invoke an exemption (in which case it is signed by the requester and their unit commander). The requirement for written documentation applies to all guideline items purchased— even if the purchase is made by credit card.

Blanket determinations for identical purchases of guideline items are acceptable as long as HQ AFSPC has not issued instructions to the contrary, and it has not issued that instruction at the writing of this plan. However, all blanket determinations need to be reviewed annually by the purchasing organization’s commander. This is because technical requirements, prices, and product performance are not fixed quantities but are subject to change. Blanket determinations are not meant to ease AP requirements but to lessen paperwork when it has been proven that there is no environmentally preferable product available.

Written determinations need to be kept in procurement files to document the decision to make a non-compliant purchase. This information will be important in case the installation receives an EPA or state audit of affirmative procurement compliance. Written determinations also document the decisions made by construction project managers, and are essential documents in case the designer’s selection of materials is challenged by a bid protest. The determination forms will be kept as long as the document they are supporting is kept.

- For each **contract** that includes guideline items and claims an exemption, a copy of the written determination must be provided to the contracting officer. DFARS 23.404(b)(3) states: “A



contract for an EPA designated item that does not meet the EPA minimum recovered material standards shall not be awarded before approval of the written determination required by FAR 23.404(b)(3).”

- If a guideline item purchase is made on a **credit card**, the written determination will be filed with the credit card holder’s purchase records. The contracting officer will need additional copies, as they will serve as the data collection point. (See [Section 2.5](#))

Determination Forms will be filled out for all purchases that **meet** EPA requirements. Completing the form and placing it in the contract file will not require much effort, will show compliance with AP requirements, and will answer questions that may arise during ECAMP audits or EPA inspections.

### 2.1.2 Summary of Requirements for Purchasers

The requirements for purchasers of guideline items can be summarized as follows:

~~Each CONUS installation must have an AP program, and all purchases of guideline items must comply with EPA recycled content requirements unless an exemption applies. Purchases made in the United States for shipment overseas also must comply with EPA requirements.~~

~~If a USAF contract includes the purchase of guideline items, the contract specifications must require the product to meet the EPA recovered material content requirements, unless written determination is provided for the contract file before the contract is awarded.~~

~~When making an USAF credit card purchase of guideline items, the purchaser must select products meeting EPA recovered material content requirements unless an exemption applies. If the requirements were not met, a written determination must be placed in the purchase files.~~

~~It is important to understand that these are unique circumstances for individual purchases. They do not provide an excuse for avoiding APP requirements in general. Section 402(e) of EO 13101 states: “For the EPA designated guideline items . . . agencies shall ensure that their affirmative procurement programs require 100 percent of their purchases of products to meet or exceed the EPA guideline”.~~

## 2.2 Elements of the Affirmative Procurement Program

RCRA is more specific about the elements that must be included in the APP. They are a Preference program, a Promotion program, a Specification and Work Statements, and Vendor Estimates, Certification and Verification program, and a Monitoring program. The following paragraphs will describe each element in more detail, along with actions to take to meet the requirements.



### **2.2.1 Preference Program**

The preference program demonstrates that the installation has a preference for products that contain recycled materials meeting the standards for recycled-content established by the EPA. ~~The preference program~~It targets installation employees, current contractors, and potential vendors that seek to do business with the installation. This is accomplished through formal policy statements, action plans, and contract language. Here are the steps taken to meet the RCRA requirement for a preference program:

2.2.1.1 An affirmative procurement policy letter was written and approved by the 341<sup>st</sup> Space Wing Commander. It can be found ~~in the~~ Appendix D of this Plan.

2.2.1.2 As stated previously, it is Malmstrom's policy that all agencies will abide by the APP 100% when purchasing items. The EPA has provided a web site, the [Comprehensive Procurement Guidelines](#) (CPG), that will provide all the necessary information needed to make the proper purchases. ~~Since~~F this web site is continually being updated, ~~so~~ this plan will reference ~~this the~~ web page instead of listing the specific items. This method will be used throughout this plan. The web page will be referenced as the most up to date information available. The "Products" section of the page lists all currently designated and proposed guideline items and their associated recycled-content requirements. The full text of each CPG and Recovered Material Advisory Notices (RMAN) can be found in the "Background" section. Other sections of the Web page provide product fact sheets, give CPG program updates, and answer frequently asked questions.

2.2.1.3 At the writing of this plan, biobased products are being recommended for use, but not enforced. The most current information on the regulations pertaining to biobased items can be found on the [Alternative Agricultural Research and Commercialization Corporation AARCC Source Book](#) web page. AFI 32-7080 calls for the Air Force to promote purchase of biobased products as part of the APP. However, not all APP requirements will apply to biobased product purchases. For example:

- EO 13101 does not require agencies to set a goal for a specific percentage of their purchases to be biobased products, and the Air Force has not set such a goal; and
- EO 13101 does not require agencies to prepare written determinations if they decide not to purchase biobased products.

According to USDA's 13 Aug 99 Federal Register notice, "Procedures for Submission of Biobased Products for Listing by USDA": "The Biobased Product List (BPL) does not qualify as rulemaking under the Administrative Procedure Act. The listing is without a binding effect. Agencies are not required to purchase biobased products, and listing does not guarantee any sales of such products."

A reporting requirement does exist. One year after USDA places a product on the BPL, Section 302(b)(6) of EO 13101 requires agencies to estimate their purchases of that product and report the estimate to the Secretary of Agriculture. The procedures for estimating biobased product

purchase data have not yet been developed. This will be accomplished by the Environmental Flight through a survey issued to all base squadrons and organizations when procedures have been developed.

Some product types may be part of both lists (CPG and BPL). When this happens, **buy recycled-content products first**. There is a binding requirement to purchase recycled-content products, but no binding requirement to purchase biobased products. Purchasers **must** buy CPG items when they meet technical, price, time, and availability requirements. If the CPG item doesn't meet one of these criteria, purchasers should buy the biobased product if it is cost effective and meets technical requirements.

2.2.1.4 This plan in its entirety represents the actions being taken at Malmstrom AFB to implement the APP. Included at Appendix G of this plan will be checklists that will efficiently guide you through the steps necessary to be in compliance with regulations concerning AP. These checklists will be developed once the plan is implemented, through feedback from the squadrons. They will not be, however, a stand-alone document. You must read and understand this plan to use the checklists properly.

2.2.1.5 All contract solicitations for the purchase of CPG items will include AP requirements language clearly stating the installation's obligation to meet EPA minimum recycled-content requirements when purchasing CPG items. See [Section 2.2.4](#) of this guide for further discussion and an example.

#### 2.2.1.6 Unique Requirements for Certain Guideline Items

**Paper.** Section 505 of EO 13101 places specific requirements on federal agency purchases of high speed copier paper, offset paper, forms bond, computer printout paper, carbonless paper, file folders, white wove envelopes, writing and office paper, book paper, cotton fiber paper, and cover stock. For each of these items, the minimum content standard was raised to 30 percent **postconsumer** materials effective 31 December 1998. If products with 30 percent **postconsumer** content are not available, do not meet performance requirements or are unreasonably priced, federal purchasers must buy products containing no less than 20 percent **postconsumer** material. No exemptions to the 20 percent minimum are authorized. As an alternative to these requirements, paper products having 50 percent **recovered** materials may be used and use is encouraged. Even though office use paper is included in the CPG there are additional and more specific guidelines on the recycled content of this type of paper. Current information on these requirements can be found on [OFEE](#) web page, under the link titled "The Results are in...Paper Containing 30 Percent Postconsumer Fiber (30% PC) Works Just Fine."

Additionally all documents (including copies) over two pages in length **will be double-sided**, unless specific requirements exist that dictate otherwise. For example, multi-part forms that require the parts to go to different personnel.

- **Re-refined Lubricating Oil.** Section 507 of EO 13101 calls on fleet and commodity managers to take immediate steps to procure re-refined oil. It also states this requirement does not preclude the acquisition of biobased (vegetable) oils. However, Air Force technical offices responsible for vehicle management must first approve vegetable oils for use in AF vehicles.

- **Retread Tires.** Section 507 of EO 13101 names the DoD Cooperative Tire Qualification Program as a focal point for retread tire purchases. The Army Tank-automotive and Armaments Command (TACOM) administer this program. Their program information is found on the “Team Tire” website (<http://www.tacom.army.mil/>).

## **2.2.2 Organization Roles and Responsibilities**

The APP is an extensive program that will need the cooperation of many different organizations in order to work effectively. The Environmental Flight, Contracting, Logistics, Operations, Legal, Safety, Bioenvironmental Engineering, and Public Affairs are all key players. Since the largest aspect of AP is purchasing, the Contracting Squadron will have the most day to day interaction with the program, and will create most of the records. Here are some additional responsibilities that are not detailed elsewhere in this plan that are none-the-less important requirements of an effective APP: *(This list is not meant to take the place of reading, understanding, and participating in the AP Plan in its entirety)*

- All Squadron Commanders
  - Will sign the Recovered Material Determination Form when an exemption is needed
  - Will assign personnel to prepare and present award nominations for personnel in their squadron who show excellence in respect to the APP
  - Will participate 100% in the APP by fostering an environment conducive to AP responsibilities
- Environmental Flight
  - Will be the experts on the requirements and drivers of the APP
  - Will educate others on how to effectively and efficiently use the APP by conducting training sessions
  - Will maintain the AP Plan
  - Will provide Recovered Material Determination Forms via documents maintained in the AP Plan
  - Will be both coach and policeman for the APP
  - Will participate 100% in the APP
  - Will not be expected to take over the task of buying the EPA-designated products, or to revise specifications
- Contracting Squadron
  - Will learn the aspects of the APP
  - Will maintain records of purchases and contracts pertaining to the APP
  - Will enforce AP requirements in all applicable contracts and agreements
  - Will participate 100% in the APP
- Procurement Originator/IMPAC Card User
  - Will learn the aspects of AP
  - Will review your purchase requests, Performance Work Statements for services, and contract specifications and revise them as necessary
  - Will buy CPG items whenever they meet the requirements, and prepare the appropriate Determination form
  - Will participate 100% in the APP

- Statements of Work (SoW), Specifications, and Contracts
  - Will include language that requires participation in the APP. Examples and guidelines for this language can be found in this plan in section 2.2.4.1

### **2.2.3 Promotion Program**

The **promotion program** is the second program element required by RCRA. It encourages employees, contractors, and potential vendors to adhere to the requirements of the established APP. The major elements of the Promotion program are listed below. This is not, however, an all-inclusive list. It is up to the individual organizations to find new, innovative, and productive ways to promote the APP.

- A fair will be planned to introduce vendors, contractors, and necessary base personnel to the aspects of AP
- The Contracting Squadron will ensure information is delivered on local products that meet the EPA requirements (this will mainly focus on non-construction items and IMPAC purchases)
- A training session for Contracting, Civil Engineering, Logistics, Supply, and other necessary Acquisition Personnel will be conducted by the Environmental Flight. The PowerPoint slides used for this training will be found on the Environmental Flight's [web page](#).
- Public Affairs will work with base organizations to ensure articles are written for the base paper and other organizational publications to promote and explain AP
- This plan will be distributed to all base organizations
- All pertinent Operating Instructions will be updated to reflect the APP
- An Awards Program will be initiated to determine participants for the White House Award program. Information on the program will be found on the Environmental Flight's [web page](#). Section Commanders will be responsible for soliciting, and preparing nominations from their squadrons to be forwarded to the Environmental Flight.
- Pilot Programs will be created to test and implement new Environmentally preferable purchasing. These will be created and implemented by the Environmental Flight, based on ideas generated from all base personnel.
- Public Affairs will help promote the APP to the base and community through media coverage of the awards and pilot programs
- Brochures will be distributed by Contracting to all vendors. A sample brochure will be found on the Environmental Flight's [web page](#).
- Contracting will ensure that all vendors are briefed on the APP procedures

### **2.2.4 Specifications and Work Statements, and Vendor Estimates, Certification and Verification** (Contract Language)

#### **2.2.4.1 Specifications and Work Statements**

Under RCRA specifications, guideline items must require the use of recovered materials to the maximum extent possible without jeopardizing the intended end use of those items. This applies whether the contract language is written in-house, or is prepared by others such as architectural-engineer (A-E) design firms. The FAR 23.704 requirement is to obtain products and services considered to be environmentally preferable (based on EPA-issued guidance), and to promote

cost-effective waste reduction when creating plans, drawings, specifications, standards, and other product descriptions.

Many service contracts include a requirement to provide guideline items. If the contractor is to be held responsible for complying with EPA recycled-content requirements, the contract must contain language specifying these requirements. Pay special attention to **contracted supply operations** such as Contractor Operated Civil Engineer Support Services (COCESS) and office supply stores operated by contractors, and to service contracts for **grounds maintenance, janitorial and reproduction services**. These are usually multi-year contracts. The contracts must be written to ensure they stay current with EPA's changes to the CPG and continue to provide the installation with products meeting EPA recycled-content requirements. If a service contract written by an organization outside the installation is creating problems for the APP, the issue needs to be identified to HQ AFSPC.

Another major procurement avenue for Guideline Item purchases is through **construction contracts**. CPG requirements must be met, unless an exemption applies, whether the project specifications are written in-house or by contract. FAR Part 36 covers construction and A-E contracts. It provides selection criteria to use when selecting A-E firms, and also includes required actions for government project managers and A-E firms.

It is the writers and executors of the contract and statement of work that are responsible for insuring the proper clauses below are in the document.

***FAR 36.602-1 lists selection criteria for A-E firms.*** The Government shall select A-E firms based on several factors, including specialized experience and technical competence in energy conservation, pollution prevention, waste reduction, and the use of recovered materials as appropriate.

***FAR 36.601-3 says that Statements of Work for A-E services shall require the A-E*** to specify the maximum practicable amount of recovered materials, consistent with performance requirements, availability, price reasonableness, and cost effectiveness.

***FAR 36.601-3 also requires the A-E*** to consider energy conservation, pollution prevention, and waste reduction to the maximum extent practicable in the specifications.

For all types of contract actions, the first step is to write the Statement of Work (SOW) or Performance Work Statement (PWS) correctly. It must be clear to all potential vendors that they are required to meet EPA requirements whenever they provide a guideline item to the Government as part of their contract. Here is one example of "boilerplate" contract language:

**In an effort to comply with the affirmative procurement requirements of Section 6002 of RCRA and Executive Order 13101, the Government strongly promotes the use of the recycled and recovered materials and products identified in the Environmental Protection Agency's Comprehensive Procurement Guidelines. These materials and products must meet the requirements of the Specifications, must not delay the progress of the work, must be available from more than one source, and must not be cost prohibitive. EPA guideline**

**items are seen as the minimum that should be considered when evaluating recycled/reuse materials. Other materials and products not listed, but commonly used in industry outside of the government, should also be considered. Material and product submittals for all recycled-content items should list the recycled and recovered materials used and the percentage content.**

To meet Executive Order requirements, engineering project managers need to review and revise all service contracts and construction specifications to include recycled-content materials and other environmentally preferable products and practices. Boilerplate language at the beginning of the contract is the minimum that is required. Success at meeting APP requirements is much more likely if a little more effort is made. Review the service contract or project design in detail, identify all of the guideline items to be used, and write recycled-content requirements referenced to the EPA's CPG website, into all applicable sections of the service contract PWS or the construction specifications. For example, if the project requires concrete, insulation, and latex paint, be sure that each of these sections references the recycled-content requirements on the EPA's CPG website. Here is an example of language that might appear in the specification section for building insulation:

**Provide fiberglass insulation with recovered material content, at the levels recommended by the EPA's CPG website.**

Preparing contracts in such detail requires up-front education and effort from the engineering team, but prevents confusion and costly mistakes when the work actually starts. For major construction, remember the A-E firm must write the specifications, but the project manager must set goals and be informed enough to make sound design decisions. The A-E is a resource; pick one that's experienced, but also keep watch to make sure the goals are being met. Finally, follow through during construction and don't allow product substitutions to dilute the environmental benefits called out in the specifications.

#### 2.2.4.2 Vendor Estimates, Certifications and Verification

RCRA requires vendors to certify that the products they are providing to the installation do indeed meet EPA requirements, and provide data on recycled-content material use. This is accomplished through contract clauses as required by the FAR.

#### ***FAR 52.223-4 Recovered Materials Certification***

Inserted in all solicitations that are for, or specify the use of, recovered materials. It states that the contractor certifies, by signing the bid documents, that the percentage of recovered materials to be used in the performance of the contract will be at least the amount required by the applicable contract specifications.

#### ***FAR 52.223-9 Certification and Estimate of Percentage of Recovered Material Content for EPA Designated Items***

When this clause is used, the contractor is required to certify that recycled-content materials were provided as called for in the specifications. The contractor is also required to estimate the percentage of recovered materials actually used in the performance of the contract. Use FAR 52.223-9 only when the total contract value (not the value of the guideline items



purchased) exceeds the simplified acquisition threshold, or \$100,000. (**However** –as stated earlier in this chapter, the size of the contract is not a license to ignore all other APP requirements besides contractor certification.)

#### ***FAR 52.223-10 Waste Reduction Program***

Insert this clause to promote cost-effective waste reduction in contracted operations. It isn't directly related to AP, but supports the larger EO 13101 goals of recycling and waste reduction.

### **2.2.5 Annual Monitoring and Review**

The final RCRA program requirement is for annual monitoring and review. This review will be conducted by both internal and external agencies.

2.2.5.1 Each installation needs to review and evaluate the effectiveness of its APP every year. This is not just collecting data for metrics; this is a look at the workings of the program to see where improvements could be made. Annually, the Environmental Flight will head a review to ensure that the APP is run effectively and efficiently. The review will run according to the annual review checklist found ~~in the~~ Appendix G of this plan. The completed checklist will be kept on file by the contracting squadron.

2.2.5.2 Section 403 of EO 13101 states that EPA inspections of federal facilities “will include, where appropriate, evaluation of facility compliance with section 6002 of RCRA and any implementing guidance.” The EO also calls on the EPA Administrator to encourage authorized states to evaluate AP compliance as part of their RCRA inspections.

#### **2.2.5.2.1 EPA Inspection Guidance and Protocols**

The EPA was tasked by EO 13101 to produce guidance for use in determining federal facility compliance. A document titled “Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act” (May 12, 1999) was written for this purpose. It is available on the OFEE web site at <http://www.ofee.gov>.

According to the Compliance Guidance, EPA has elected to focus initially on field level awareness of the RCRA 6002 requirements. AP compliance may be reviewed by EPA or authorized State inspectors as part of RCRA, Federal Facility Compliance Act, or "multi-media" inspections. Two actions for inspectors are included in the EPA guidance:

- Distribution of a questionnaire to the environmental management office, and
- Inspection of the facility motor vehicle maintenance activities (where such activities exist).

Motor vehicle maintenance activities were selected by EPA for this effort due to their common presence at a broad range of Federal facilities; significant awareness and availability of products and services that meet the EPA guidelines for vehicular products; and likelihood that RCRA inspections would normally be conducted at these locations.

The motor vehicle maintenance audit protocol and the questionnaire are included in the guidance document that is posted on the OFEE website.

#### 2.2.5.2.2 Applicability to Air Force Activities

The AP requirements of RCRA 6002 are outside the scope of the waiver of sovereign immunity set forth in RCRA 6001, as that waiver extends only to the “control and abatement of solid waste or hazardous waste disposal and management.” Only Congress can broaden a waiver of sovereign immunity. Thus, direction in EO 13101 that regulators review compliance with RCRA 6002 during RCRA inspections does not make bases subject to enforcement actions for alleged violations of that section. The bottom line is that while bases should comply with the EO, AF personnel should also understand that any enforcement of RCRA 6002 AP requirements by regulators is beyond the scope of their authority. A NOV may be issued for affirmative procurement violations, but inclusion of RCRA section 6002 requirements in a subsequent Administrative Order would be an overreach of the regulator’s enforcement authority. In other words, EPA can issue an APP NOV but can not take enforcement action based on APP violations. Please consult the installation's legal office with questions about APP enforcement.

### 2.3 Hints and Tips for the APP

Here are some ideas for enhancing the installation APP:

#### **Use available resources.**

Browse through the web sites referenced throughout this plan and use them to increase your knowledge and understanding of AP items.

#### **Closed-Loop Contracts**

Contracting will determine which contracts the base has that can be turned into closed loop contracts. Contracting will then initiate a process to turn the contracts into closed loop contracts when possible. A closed loop contract requires a vendor to pick up your waste, create a product, and return it to you for use. Some are already available, for example, DLA offers access to closed-loop contracts for re-refined motor oil.

#### **Prepare and update a local list of environmentally preferable products and suppliers**

A list will be started by hosting an Environmentally Preferable Products Fair and inviting local vendors to display their products. During the fair, vendors and manufacturers will be able to discuss new products, comment on life cycle costs, and provide feedback and certifications on current products. After the fair, the contracting office will maintain the list based on feedback about new products from base organizations. The list will be available to all purchasers (including IMPAC cardholders) through the Intranet on the Environmental Flight’s web page under Pollution Prevention.

#### **Institute cooperative purchasing for better prices**

Set up blanket purchase agreements with vendors who offer qualifying products, or combine purchases with other installation offices and purchase in quantity.

#### **Attend conferences providing AP information**



The annual National Recycling Coalition (NRC) federal sessions offer excellent opportunities for learning and networking. Visit NRC on the Web at <http://www.nrc-recycle.org/> for more information. More conferences will be added here during the annual reviews as they are found, attended, and critiqued.

### **Use the APP as part of the installation public relations campaign**

An installation APP Fact Sheet can be sent to community groups and state and local regulators. Include APP awareness in Earth Week activities. Also, Malmstrom will work closely with the community to ensure that everyone works towards AP.

## **2.4 Environmentally Preferable Procurement (EPP) Pilot Projects**

EO 13101 required EPA to develop EPP guidance that is designed for government-wide use and is targeted towards products and services that have the most effect. EPA published their "Final Guidance on Environmentally Preferable Purchasing for Executive Agencies" in the Federal Register on 20 Aug 99. It is available on EPA's EPP website at [www.epa.gov/opptintr/epp](http://www.epa.gov/opptintr/epp).

EO 13101 encourages federal agencies ~~to~~ partner with EPA on pilot projects that will be designed to test EPA's concepts, and provide them with practical information to improve future guidance. A template for pilot project case studies is included as an Appendix to EPA's guidance, and can be found on the above-mentioned Internet site. If a base organization wishes to begin an EPP pilot project they should contact the Environmental Flight for guidance.

Case studies for previous pilot projects are posted on the EPP website given above. These EPP pilot projects usually generate future requirements, whether or not the pilot was performed within DoD. In fact, EO 13101 calls for agencies to use the EPP guidance and lessons learned from all pilot projects to modify their APPs. Reviewing pilot project results can provide a glimpse into the future of AP and can aid program managers in anticipating future changes. MAJCOMs and installations should read all current and future pilot project studies, and begin planning to incorporate their results into their own APPs.

## **2.5 Reporting**

The only APP data currently collected at installation level is the certification of guideline item purchases, on the Recovered Materials Determination form. For contracts FAR 52.223-9 requires this information when the total contract value exceeds \$100,000. It should be used locally to determine contractor compliance with specifications for guideline item purchases. The data is not rolled up for reporting to higher headquarters.

Since Malmstrom prepares Recovered Material Determination Forms for all purchasing actions that include guideline items, simply counting the number of forms that document compliant purchases and comparing this with the number of forms that document noncompliance (exempted) purchases will ~~give an idea of how~~estimate the success~~ful of~~ful of the A~~PPPP~~PPPP is.

## **CHAPTER THREE: TOOLS AND RESOURCES**

### 3.0 Overview

This chapter is a summary of APP information resources. Although many of these resources were mentioned earlier in this plan, they will be listed again here so that this chapter can serve as a comprehensive APP resource guide. Unless stated otherwise, these resources may be downloaded from AFCEE's website: [www.afcee.brooks.af.mil/eq/ap/ap.htm#](http://www.afcee.brooks.af.mil/eq/ap/ap.htm#)

### 3.1 Program Management Tools

#### **Recovered Materials Determination Form**

Will be used to document a procurement action's compliance with CPG requirements. The form also contains a section to be used if a non-complaint item was purchased. A copy of the form is at Appendix D of this plan and will be on the Intranet on the Environmental Flight's web page under Pollution Prevention.

#### **Civil Engineering Fact Sheet**

The Fact Sheet is a two-page PowerPoint document, which is intended to be printed double-sided on a single sheet of paper. One side is a Fact Sheet describing APP requirements. The second side is a checklist of construction-related guideline items and their corresponding EPA recycled-content requirements. A copy of the form is at Appendix E of this guide and will be on the Intranet on the Environmental Flight's web page under Pollution Prevention.

#### **Affirmative Procurement Awareness Brochure**

This brochure gives basic awareness information for people who are new to APP requirements. A copy of the form is at Appendix F of this guide and on the Internet at <http://www.afcee.brooks.af.mil/EQ/ap/epp/eppttraining.htm>

#### **Environmentally Preferable Purchasing (EPP) Training Briefing for EO 13101 Compliance**

A lengthy PowerPoint briefing package prepared by the AFCEE Environmental Quality Directorate. It covers the following topics: Definitions, Benefits of EPP, Barriers and Common Misconceptions, DoD Policy, Regulatory Drivers and Requirements, Role of the Government, Role of the EPA, Guideline Items, Role of the USDA, Biobased Products, Executing the Program, Resource List/web sites, and USAF Points of Contact. A copy can be found at <http://www.afcee.brooks.af.mil/EQ/ap/epp/eppttraining.htm>

### 3.2 List of Policy Drivers

Web addresses are provided for all documents. AF personnel having difficulty with Web downloads may also request copies from AFCEE's PRO-ACT service at DSN 240-4214.

RCRA Section 6002 (42 U.S.C. 6962): <http://uscode.house.gov/>

Executive Order 13101, “Greening the Government Through Waste Prevention, Recycling, and Federal Acquisition”: <http://www.ofee.gov>

40 CFR 247, “Comprehensive Procurement Guideline for Products Containing Recovered Materials”: <http://www.access.gpo.gov/nara/cfr/waisidx/40cfr247.html>

Federal Acquisition Regulation (FAR) Subchapter D, Part 23 (for program requirements), and FAR Part 52 (for contract clauses): <http://www.arnet.gov/far>

DoD FAR Supplement (DFARS) 223.404(b)(3): <http://www.acq.osd.mil/dp/dars/dfars/dfars.html>

AFI 32-7080, “Compliance Assurance and Pollution Prevention”:  
<http://afpubs.hq.af.mil/pubfiles/af/32/afi32-7080/afi32-7080.pdf>

AF Engineering Technical Letter (ETL) 00-1, “EPA Guideline Items in Construction and Other Civil Engineering Specifications” (revised document, which replaces ETL 94-7). On the “Construction Criteria Base” compact disk and website: <http://www.ccb.org> (see your design engineers to get the CCB disk or the password to access CCB on line), **or** the Affirmative Procurement section of AFCEE's website, <http://www.afcee.brooks.af.mil/eq/ap/ap.htm#>

DOD Instruction 4715.4, Pollution Prevention:  
<http://denix.cecer.army.mil/denix/Public/Library/P2-Manager/toc.html>

AF Pollution Prevention Strategy, 24 July 1995:  
<http://denix.cecer.army.mil/denix/Public/Library/P2-Manager/toc.html>

### 3.3 Technical Resources

**Lists of the EPA guideline items and their recycled-content requirements** are found in the “Products” section of EPA’s CPG Web page. <http://www.epa.gov/cpg/products.htm>

**Comprehensive Procurement Guidelines (CPG) & Recovered Material Advisory Notices (RMAN)** are also found on EPA’s web page. The “Background” section links to proposed and final designated item lists, technical background documents, and Federal Register notices for each update of the CPG and RMAN. <http://www.epa.gov/cpg/backgrnd.htm>

**CPG Fact Sheets** are also found on EPA’s web page. These Fact Sheets summarize information on the CPG program, EPA’s recovered materials content requirements, case studies from around the country, and key resources, associations, and Web sites. There is a Fact Sheet for each of the CPG product categories. You can use the Fact Sheets online as references, or print them and use them as handouts in APP training sessions. <http://www.epa.gov/cpg/factshts.htm>

**AARCC Biobased Products “Source Book”** is a catalog of biobased products made from agricultural materials. It includes contact information for one or more manufacturers of each item. <http://www.usda.gov/aarc/aarcsrbk.html>

**EPA WasteWi\$e Program** is a voluntary partnership program that targets the reduction of municipal solid waste through recycling and buying recycled: <http://www.epa.gov/wastewise>. The “Buy Recycled Resources” list in the Publications section of the website is comprehensive and current. EPA also provides a WasteWi\$e help line (1-800-EPA-WISE) that can refer you to a buy-recycled contact in your state.

**EPA’s Environmentally Preferable Purchasing Program** is a federal government-wide program to encourage EPP and assist agencies. The EPP web page includes success stories and pilot project information. EO 13101 calls for agencies to use the EPP guidance and lessons from these pilot projects to modify their AP programs. <http://www.epa.gov/opptintr/epp>

**OFEE Web Page** resources include a Strategic Plan to implement EO 13101 (authored by the White House Task Force on Greening the Government Through Waste Prevention and Recycling) and the EPA/FEE “Guidance on Conducting Inspections of Federal Facilities for Compliance with Section 6002 of the Resource Conservation and Recovery Act.” The OFEE newsletter and other resources are also available. <http://www.ofee.gov>

**Defense Logistics Agency (DLA) Catalogs** <http://www.dscr.dla.mil/catalogs/catalog.htm>  
Download the **Environmentally Preferred Product Catalog** from DLA’s website, or call 1-800-345-6333 or DSN 695-4865. Download the **Energy Efficient Lighting Catalog** from DLA’s website, or call 1-800-DLA-BULB. For other specific DLA product information, visit <http://www.dscr.dla.mil/products/epa/htms/pocs.htm> for a list of contact phone numbers.

**Federal Logistics Information System (FLIS)** is the master database, or ‘catalog’ for the federal supply system. A joint service committee working under DLA’s leadership is modifying FLIS to include information on environmentally preferable products. A series of environmental attributes are being defined, evaluated, and included in FLIS as appropriate. Three attributes have been approved so far: “Energy Efficient”, “CPG Items”, and “Biobased”. Other attributes are in the coordination process. Visit <http://www.jgenvatt.dla.mil/toc.htm> for more information on this initiative. To take advantage of the FLIS information without being a database expert, visit <http://www.supply.dla.mil>, select the link to the “Electronic Mall” and fill out the registration form. Then browse the EMALL. NSN items bearing an Environmental Attribute Code are identified with a Green Tree symbol on the Search Summary Screen.

**General Services Administration (GSA) Environmental Products Guide** is available at <http://pub.fss.gsa.gov/environ> or call (817) 334-5215. To search the GSA online catalog for specific types of environmentally preferable products, go to this website, and then click on the “GSA Advantage” logo at the bottom of the page. On the GSA Advantage page, click the “Advanced Search” link. The Advanced Search function allows you to enter a product type in the “Search For” box, and select from one or more of the following environmental attributes: “Environmental Items”, “Recycled Items”, “Energy Efficient Items”, or “Energy Star Items”. For example, entering “latex paint” in the search box and checking the “Recycled Items” block will return a list of latex paints that have recycled content.

**Javits-Wagner-O’Day (JWOD) Program** creates jobs and training opportunities for people who are blind or who have other severe disabilities. It is a mandatory source of supply for

federal employees. JWOD program items are listed in the GSA Environmental Products catalog. Visit <http://www.jwod.gov/default.asp> and look under Procurement Information for distributors and contracting information. For more information send E-mail to [info@jwod.gov](mailto:info@jwod.gov), call (703) 603- 7740, or fax (703) 603-0655.

**Malmstrom AFB Base Supply Center** located in building 410 stocks many of the items on the CPG list. They can be contacted at 406-731-6129

**Government Printing Office (GPO)** furnishes blank paper, inks, and similar supplies to all governmental activities on order. It prepares catalogs and distributes and sells Government publications. To obtain recycled-content paper from GPO, your local Defense Automated Printing Services (DAPS) office is the main point of contact – or credit card holders may contact Mr. Bob Colvin at (202) 512-0208.

**National Recycling Coalition** is a non-profit coalition committed to maximizing recycling. The NRC also works to develop markets for recovered materials and recycled-content products. Their conference, the “Annual Congress and Exposition,” includes a federal attendee track that provides the latest information on AP. Visit <http://www.nrc-recycle.org> for conference information and an on-line library. Look in the “Buying Recycled” section of the library for AP fact sheets and for a series of Case Studies in architectural renovations that emphasize recycled-material products. The Case Studies include manufacturer contact information for a variety of products.

**McRecycle USA Database Listing** is a free booklet available from McDonald’s Corporation Environmental Affairs, Kroc Drive, Oak Brook, IL 60521, or (630) 623-5779. McRecycle USA is a program designed to stimulate the market for recycled products. The product listing is organized by Construction Standards Institute (CSI) format. Additional divisions have been added at the end to accommodate non-construction products.

**Guide to Resource Efficient Building Elements** is produced by the non-profit Center for Resourceful Building Technology in Missoula, Montana. CRBT promotes resource efficiency in building design, materials selection and construction practices. The Guide is a national directory that is updated yearly, and contains contact and product information for more than four hundred building material manufacturers producing everything from foundations to roofing. It also contains information on resources used in construction and resource efficient design. Cost is \$28. Order from <http://www.montana.com/CRBT>

**Oikos Green Building Source** provides a searchable database of green building products, including (but not limited to) recycled-content products: <http://oikos.com/index.html>. Recycled-content products are flagged in the database by an “environmental benefit code” of RC.

**Air Force Center for Environmental Excellence (AFCEE)** Affirmative Procurement Program home page offers A Guide to Green Purchasing, training materials, sample APP plans, and links to other resources. Please visit at <http://www.afcee.brooks.af.mil/eq/ap/ap.htm#>.

**AFCEE's PRO-ACT Program** is available to Air Force personnel and their contractors to answer technical questions about environmental program areas, including AP. Please contact PRO-ACT's research staff at DSN 240-4214 or visit the PRO-ACT web site at [http://www.afcee.brooks.af.mil/pro\\_act/pro\\_actform.htm](http://www.afcee.brooks.af.mil/pro_act/pro_actform.htm).

**MAFB OPLAN 00-1**  
**APPENDIX A (U)**

**GLOSSARY:**

For clarification of terms not listed here look in **EPA's Buy-Recycled Series Fact Sheets.**

**Acquisition** - acquiring by contract, using appropriated funds, supplies or services (including construction) by and for the use of the federal government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, or demonstrated and evaluated. Acquisition begins when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation, selection of sources, award of contracts, contract financing, contract performance, contract administration, and those technical and management functions directly related to the process of fulfilling agency needs by contract. [Executive Order 13101]

**Affirmative Procurement (AP) Program** - a program assuring guideline items composed of recovered materials will be purchased to the maximum extent practicable, consistent with federal law and procurement regulations. [RCRA]

**Biobased product** – a commercial or industrial product (other than food or feed) that utilizes biological products or renewable domestic agricultural (plant, animal, and marine) or forestry materials. [Executive Order 13101]

**Certification** - provided by offerors/bidders/vendors, it is written documentation certifying the percentage of recovered materials contained in products or to be used in the performance of the contract is at least the amount required by applicable specifications or other contractual requirements. Certification on multi-component or multi-material products should verify the percentage of postconsumer waste and recycled material contained in the major constituents of the product.

**Comprehensive Procurement Guidelines (CPG)** – the documents in which EPA officially designates the specific recycled-content products to be included in AP programs. Products designated in the CPG are often referred to as “guideline items.” The CPG requirements are codified in 40 CFR Part 247.

**CONUS** - the continental US, Alaska, Hawaii, and territories/possessions.

**Cost-Effective Procurement Preference Program** - a procurement program favoring more environmentally-sound or energy-efficient products and services than other competing products and services, where price and other factors are equal. [OFPP Policy Letter 92-4]

**Environmentally Preferable** - products or services having a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose. This comparison may consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, or disposal of the product or service. [Executive Order 13101]

**Environmentally Sound** - a product or service less damaging to the environment when used, maintained, and disposed of in comparison to a competing product or service. [OFPP Policy Letter 92-4]

**Executive Agency or Agency** - an Executive agency as defined in 5 U.S.C 105. For the purpose of this order, military departments, as defined in 5 U.S.C. 102, are covered under the auspices of the Department of Defense. [Executive Order 13101]

**Federal Supply Source** - any supply source managed by a federal agency such as the General Services Administration, Government Printing Office, or Defense General Supply Center.

**Installation** - In the Air Force, a self-supporting center of operations for actions of importance to Air Force combat, combat support, or training. It is operated by an active, reserve, or guard unit of group size or larger with all land, facilities, and organic support needed to accomplish the unit mission. It must have real property accountability through ownership, lease, permit, or other written agreement. Agreements with foreign governments that give the Air Force jurisdiction over real property meet this requirement. The term “installation” includes Air Force bases, Field Operating Agencies, Air Force Reserve bases, and Air National Guard bases.

**Life-Cycle Assessment** - the comprehensive examination of a product's environmental and economic aspects and potential impacts throughout its lifetime, including raw material extraction, transportation, manufacturing, use, and disposal. [Executive Order 13101]

**Life-Cycle Cost** - the amortized annual cost of a product, including capital costs, installation costs, operating costs, maintenance costs, and disposal costs discounted over the lifetime of the product. [Executive Order 13101]

**Minimum Content Standard** - the minimum recovered material content specifications set to assure the recovered material content required is the maximum available without jeopardizing the intended item end use or violating the limitations of the minimum content standards set forth by EPA's guidelines. [RCRA, 42 U.S.C. 6962]

**Postconsumer Material** - a material or finished product that has served its intended use and has been diverted or recovered from waste destined for disposal, having completed its life as a consumer item. Postconsumer material is a part of the broader category of recovered materials. Postconsumer recovered materials, for purposes of purchasing paper and paper products, is a subset of the broader term “recovered materials”, and means: (1) Paper, paperboard and fibrous wastes from retail stores, office buildings, homes, and so forth, after they have passed through their end-usage as a consumer item including: Used corrugated boxes; old newspapers; old



magazines; mixed waste paper; tabulating cards, and used cordage; and (2) All paper, paperboard, and fibrous wastes that enter and are collected from municipal solid waste. [RMAN I]

**Preconsumer Materials** - Materials generated in manufacturing and converting processes, such as manufacturing scrap and trimmings/cuttings. Preconsumer materials, along with postconsumer materials, are part of the broader category of “recovered materials.” [Glossary on EPA’s CPG Website]

**Preference** - when two products or services are equal in performance characteristics and price, the Government, in making purchasing decisions, will favor the more environmentally sound or energy-efficient product. [OFPP Policy Letter 92-4]

**Procuring Agency** - any federal agency, or any State agency or agency of a political subdivision of a State, which is using appropriated federal funds for such procurement, or any person contracting with any such agency with respect to work performed under such contract. [RMAN I]

**RCRA** - Resource Conservation and Recovery Act, 42 U.S.C. 6901, et. seq., as amended

**Recovered Materials** – waste materials and byproducts which have been recovered or diverted from solid waste, but such term does not include those materials and byproducts generated from, and commonly reused within, an original manufacturing process. [Executive Order 13101]

**Recovered Materials Advisory Notices (RMAN)** – an EPA document that accompanies each of the Comprehensive Procurement Guidelines. The RMANs recommend recycled-content ranges for products designated in the CPG, based on current information on commercially available recycled-content products. Per AFI 32-7080, these recommended content ranges are mandatory for all Air Force acquisitions of CPG products, unless an exemption applies.

**Recyclability** - the ability of a product or material to be recovered from, or otherwise diverted from, the solid waste stream for the purpose of recycling. [Executive Order 13101]

**Recycled Material** - a material utilized in place of raw or virgin material in product manufacturing consisting of materials derived from postconsumer waste, industrial scrap, material derived from agricultural wastes, and other items, all of which can be used in new product manufacture. [OFPP Policy Letter 92-4]

**Recycling** - the series of activities, including collection, separation, and processing, by which products or other materials are recovered from the solid waste stream for use in the form of raw materials in the manufacture of new products other than fuel for producing heat or power by combustion. [Executive Order 13101]

**Specification** - a description of the technical requirements for a material, product, or service that includes the criteria for determining whether these requirements are met. In general,

specifications are in the form of written commercial designations, industry standards, and other descriptive references. [CPG I]

**Unreasonable Price** – The price of a recycled-content product is considered unreasonable if it exceeds the cost of a comparable non-recycled item.

**Verification** - procedures used by procuring agencies to confirm both vendor estimates and certifications of the percentages of recovered material to be used in the performance of a contract, or contained in the products supplied to them.

**Virgin Material** - a mined or harvested raw material to be used in manufacturing.

**Waste Prevention** - any change in the design, manufacturing, purchase, or use of materials or products (including packaging) to reduce their amount or toxicity before they are discarded. Waste prevention also refers to the reuse of products or materials. [Executive Order 13101]

**Waste Reduction** - preventing or decreasing the amount of waste being generated through waste prevention, recycling, or purchasing recycled and environmentally preferable products. [Executive Order 13101]

**MAFB OPLAN 00-1**  
**APPENDIX B (U)**

**ACRONYMS AND ABBREVIATIONS:**

AARCC	Alternative Agricultural Research and Commercialization Corporation
A-E	Architectural-Engineer
AF	Air Force
AFB	Air Force Base
AFCEE	Air Force Center for Environmental Excellence
AFI	Air Force Instruction
AP	Affirmative Procurement
APP	Affirmative Procurement Program
BPL	Biobased Products List
CCB	Construction Criteria Base
CE	Civil Engineering
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
COCESS	Contractor Operated Civil Engineer Support Services
CONUS	Continental United States
CPG	Comprehensive Procurement Guidelines
CRBT	Center for Resourceful Building Technology
CSI	Construction Standards Institute
DAPS	Defense Automated Printing Services

DFARS	DoD supplement to the Federal Acquisition Regulation
DLA	Defense Logistics Agency
DoD	Department of Defense
EA	Enforcement Action
EO	Executive Order
EPA	Environmental Protection Agency
EPC	Environmental Protection Committee
EPP	Environmentally preferable purchasing
ETL	Engineering Technical Letter
FAR	Federal Acquisition Regulation
FEE	Federal Environmental Executive
GPO	Government Printing Office
GSA	General Services Administration
JWOD	Javits-Wagner-O'Day
MAFB	Malmstrom Air Force Base
MAJCOM	Major Command
NOV	Notice of Violation
NRC	National Recycling Coalition
OFEE	Office of the Federal Environmental Executive
OFPP	Office of Federal Procurement Policy
PWS	Performance Work Statement
RCRA	Resource Conservation Recovery Act
RMAN	Recovered Material Advisory Notice

SOW	Statement of Work
TACOM	Tank-automotive and Armaments Command (US Army)
USDA	United States Department of Agriculture

**Headquarters 341st Space Wing  
Malmstrom Air Force Base, Montana 59402  
20 Oct 2000**

**MAFB OPLAN 00-1  
APPENDIX C (U)**

**RECOVERD MATERIALS DETERMINATION FORM:**

# Recovered Materials Determination Form

## Instructions

This form is to be completed by the procurement originator when EPA-designated items included in the Affirmative Procurement Program for Recovered Materials are being procured from outside vendors. For questions on whether the product counts as "EPA designated" or what the required recycled content is, refer to product descriptions on EPA's website at <http://www.epa.gov/cpg>. This form is not required for items requisitioned from established Federal supply sources.

1. The procurement originator lists which item(s) apply to the procurement request, the required recycled content, the actual recycled content, and signs and dates the appropriate Certification on the back of this form.
2. If an exemption is being claimed, the procurement originator's unit commander also signs the Certification on the back of this form.
3. The completed form becomes part of the contracting office contract file.

Procurement Request No. \_\_\_\_\_

The EPA-designated items being procured are:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Building insulation                       | <input type="checkbox"/> Plastic desktop accessories                                | <input type="checkbox"/> Garden and soaker hoses                        |
| <input type="checkbox"/> Flowable fill                             | <input type="checkbox"/> Printing and writing papers                                | <input type="checkbox"/> Lawn and garden edging                         |
| <input type="checkbox"/> Latex paint                               | <input type="checkbox"/> Printer ribbons  | <input type="checkbox"/> Patio blocks                                   |
| <input type="checkbox"/> Floor tiles                               | <input type="checkbox"/> Toner cartridges   | <input type="checkbox"/> Landscaping timbers and posts (plastic lumber) |
| <input type="checkbox"/> Laminated paperboard                      | <input type="checkbox"/> Awards and plaques   | <input type="checkbox"/> Compost from yard trimmings or food waste      |
| <input type="checkbox"/> Structural fiberboard                     | <input type="checkbox"/> Playground surfaces  | <input type="checkbox"/> Commercial/industrial sanitary tissue products |
| <input type="checkbox"/> Polyester carpet                          | <input type="checkbox"/> Park and recreational furniture                            | <input type="checkbox"/> Sorbents                                       |
| <input type="checkbox"/> Carpet Backing                            | <input type="checkbox"/> Running tracks   | <input type="checkbox"/> Industrial Drums                               |
| <input type="checkbox"/> Carpet Cushion                            | <input type="checkbox"/> Playground equipment                                       | <input type="checkbox"/> Railroad grade crossings/surfaces              |
| Cement & concrete containing:                                      | <input type="checkbox"/> Traffic barricades   | <input type="checkbox"/> Pallets  |
| <input type="checkbox"/> Coal fly ash                              | <input type="checkbox"/> Signage  | <input type="checkbox"/> Paperboard and packaging                       |
| <input type="checkbox"/> Ground granulated blast furnace slag      | <input type="checkbox"/> Traffic cones  | <input type="checkbox"/> Strapping and stretch wrap                     |
| <input type="checkbox"/> Binders                                   | <input type="checkbox"/> Channelizers   | <input type="checkbox"/> Shower & restroom dividers/partitions          |
| <input type="checkbox"/> (paper, solid plastic or plastic covered) | <input type="checkbox"/> Delineators  | <input type="checkbox"/> Plastic trash bags                             |
| <input type="checkbox"/> Plastic presentation folders              | <input type="checkbox"/> Flexible delineators                                       | <input type="checkbox"/> Mats   |
| <input type="checkbox"/> Plastic file folders                      | <input type="checkbox"/> Parking stops  | <input type="checkbox"/> Hydraulic mulch                                |
| <input type="checkbox"/> Plastic clip portfolios                   | <input type="checkbox"/> Plastic fencing (snow or erosion control, safety barriers) | <input type="checkbox"/> Tray liners                                    |
| <input type="checkbox"/> Plastic clipboards                        | <input type="checkbox"/> Engine coolants  | <input type="checkbox"/> Newsprint                                      |
| <input type="checkbox"/> Plastic envelops                          | <input type="checkbox"/> Re-refined lubricating oils                                |   |
| <input type="checkbox"/> Office recycling containers               | <input type="checkbox"/> Retread tires  |   |
| <input type="checkbox"/> Office waste receptacles                  |   |   |

## CERTIFICATION

Procurement Request No. \_\_\_\_\_

Complete Part A or Part B as appropriate:

\*\*\*\*\*

A. I hereby certify the Statement of Work/Specifications for the requisition of all materials listed on this form complies with EPA standards for recycled/recovered materials content.

\_\_\_\_\_  
Procurement Originator's Signature

\_\_\_\_\_  
Date

\*\*\*\*\*

B. The following item does not comply with EPA standards for recycled/recovered materials *(please complete a separate justification for each noncompliant item purchased as part of this procurement action)*: \_\_\_\_\_

The exemption being claimed for this purchase is:

\_\_\_ The product does not meet appropriate performance standards

\_\_\_ The product is not available within a reasonable time frame

\_\_\_ The product is not available competitively (from two or more sources)

\_\_\_ The product is only available at an unreasonable price (it costs more than a comparable non-recycled-content product). The recycled-content product costs \$\_\_\_\_\_ per \_\_\_\_\_ and the non-recycled-content product costs \$\_\_\_\_\_ per \_\_\_\_\_

\_\_\_\_\_  
Procurement Originator

\_\_\_\_\_  
Date

\_\_\_\_\_  
Commander

\_\_\_\_\_  
Date



**Headquarters 341st Space Wing  
Malmstrom Air Force Base, Montana 59402  
20 Oct 2000**

**MAFB OPLAN 00-1  
APPENDIX D (U)**

POLICY LETTER:



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS 341ST SPACE WING (AFSPC)**

MEMORANDUM FOR ALL MALMSTROM AFB PERSONNEL

FROM: 341 SW/CC

SUBJECT: Environmentally Preferable Purchasing Policy

1. The purchase and use of products and services can have a profound impact on the environment. Malmstrom AFB recognizes the positive impact that it can make on the environment through the purchasing decisions employees make. We intend to integrate environmental considerations into every aspect of the 341<sup>st</sup> Space Wing acquisition. Environmental protection culture must be integrated into all aspects of our professional mission

2. Overall statement of policy:

a. All 341<sup>st</sup> Space Wing personnel should seek to reduce the environmental damages associated with their purchases by increasing their acquisition of environmentally preferable products and services to the extent feasible, consistent with price, performance, availability, and safety considerations.

b. Environmental factors should be taken into account as early as possible in the acquisition planning and decision-making process.

c. Responsibility for environmentally preferable purchasing should be shared among all wing personnel.

d. Environmentally preferable purchasing represents one important component of this wing's commitment to pollution prevention.

3. The 341<sup>st</sup> Space Wing is committed to: Increasing the acquisition of environmentally preferable products and services; identifying and implementing pilot projects to test the best ways to incorporate environmental preferability into acquisition; and establishing incentive and award programs to recognize those people, teams, and work groups who are most successful at promoting the purchase of environmentally preferable products.

4. If you have any questions or concerns, please contact Mr. Bob Moretti at 7228 or Mr. Jim Morris at 6440.

*//Signed//*

THOMAS F. DEPPE, Colonel, USAF  
Commander

**Headquarters 341st Space Wing  
Malmstrom Air Force Base, Montana 59402  
20 Oct 2000**

**MAFB OPLAN 00-1  
APPENDIX E (U)**

**CIVIL ENGINEERING FACT SHEET:**

(If viewing the electronic version see accompanying PowerPoint file)

**Headquarters 341st Space Wing  
Malmstrom Air Force Base, Montana 59402  
20 Oct 2000**

**MAFB OPLAN 00-1  
APPENDIX F (U)**

**AFFIRMATIVE PROCUREMENT AWARENESS BROCHURE:**  
(If viewing the electronic version see accompanying Adobe file)

Headquarters 341st Space Wing  
Malmstrom Air Force Base, Montana 59402  
20 Oct 2000

**MAFB OPLAN 00-1**  
**APPENDIX G (U)**

**CHECKLISTS:**

These checklists are meant as an aid in implementing the Affirmative Procurement Program. They are **not** meant as a sole source of information. They can **not** replace reading the Plan itself and understanding it. They **are** a quick reference guide that will make implementing AP easier and more effective. If you have any suggestions on how to make the checklists easier please contact the Environmental Flight.

Annual Review Checklist	Is Action Required (yes/no)
1) Collect and review a sampling of Determination and Certification Forms from each Squadron or unit.	
a) Is the Squadron Commander signing Certifications when necessary?	
b) Are blanket determinations still applicable?	
c) Is the form meeting the customers need?	
d) Has the Squadron Commander reviewed their blanket Determinations for the year?	
2) Does the Driving Policy section of the plan need to be updated?	
3) Has the Applicability Requirements changed?	
a) Appropriated funds?	
b) Non-Appropriated funds?	
c) Government owned or leased buildings?	
4) Does the Preference Program need to be updated?	
a) Inform base of updated CPG and Bio-Based Products list?	
b) Are all SOWs and contracts current with AP policy?	
c) Have there been any additional Unique Product Requirements?	
5) Is the Promotion Program effective?	
a) Are we reaching all our customers?	
b) Is the material beneficial to vendors and contractors?	
c) Is the training session providing base personnel with the knowledge to properly implement the AP Plan?	
6) Are we prepared for inspection and reviews?	
a) Is the annual review providing new information to the program and helping it evolve in with changing circumstances?	
b) Are we passing State and EPA inspections of the APP?	
7) Have we initiated any Environmentally Preferable Procurement Pilot Projects?	
8) Has the list of available conferences been updated?	
9) Has a new reporting system been created?	
a) Are we reporting relevant metrics?	
10) Is the Distribution List current and does it include all purchasing agents and units on base?	

**Headquarters 341st Space Wing**  
**Malmstrom Air Force Base, Montana 59402**  
**20 Oct 2000**

**MAFB OPLAN 00-1**  
**APPENDIX Z (U)**

**DISTRIBUTION LIST:**

This plan is meant for all units on Malmstrom AFB. It is the responsibility of each unit to ensure that all purchasing agencies under their authority receive and adhere to this plan. In order to conserve paper an electronic version of this plan is available on the Intranet and can be referenced by subordinates instead of printing another hard copy. It is highly encouraged to use the electronic copy, especially since it contains hyperlinks that allow you to easily jump between references on the Internet and within the document itself.

<u>Unit/Office Symbol</u>	<u>Copies</u>	<u>Unit/Office Symbol</u>	<u>Copies</u>
341 MW/CC	1	341 OG/40 RQF	1
341 MW/XP	1	341 MDG/SG	1
341 MW/JA	1	341 MDG/AMDS	1
341 MW/SE	1	341 MDG/DS	1
341 MW/HC	1	341 MDG/MDOS	1
341 MW/PA	1	341 MDG/MDSS	1
341 MW/SE	1	AFOSI DET 806	1
341 MW/CPTS	1	ADC	1
341 LG/CC	1	DRMO	1
341 LG/LSS	1	819 RHS	1
341 LG/SUPS	1	Corps of Engineers	1
341 LG/TRANS	1	Commissary	1
341 LG/CONS	1	AAFES	1
341 LG/MXS	1		
341 SPTG/CC	1		
341 SPTG/SVS	1		
341 SPTG/CES	1		
341 SPTG/CS	1		
341 SPTG/SFS	1		
341 SPTG/MSS	1		
341 OG/CC	1		
341 OG/10 MS	1		
341 OG/12 MS	1		
341 OG/490 MS	1		
341 OG/564 MS	1		
341 OG/OSS	1		
341 OG/741 SFS	1		